

1
2
3
4
5 **UNITED STATES BANKRUPTCY COURT**
6 **WESTERN DISTRICT OF WASHINGTON**

7
8 In re:) Case No. 17-14012 TWD Ch. 13
9 Douglas Burrell Williams)
10 Terri Denise Barnes)
11 Debtor(s))
12)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

11 **COMES NOW**, Debtor, by and through counsel, respond to the Trustee's Motion to
12 Dismiss, in support of thereof alleges the following:

- 13 1. It appears that there was a disruption in payments from Debtor's new employer but,
14 to counsel's knowledge, payments have resumed as of February 6, 2020;
15
16 2. Debtor is not opposed to strict compliance with a 10-day notice;

17 **WHEREFORE**, based on the facts above, debtor requests an order denying or
18 continuing the Trustee's motion to dismiss.

19 **DATE:** February 12, 2020

20 Respectfully submitted:

21 /s/ Mark A. Ditton #45432

22 Mark A. Ditton, WSBA#45432
23 NW Debt Relief Law Firm
24 1312 Main Street
25 Vancouver, WA 98660
360-831-0893

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served upon all creditors and interested parties on the attached mailing matrix by sending a true, full and exact copy enclosed in a sealed envelope by regular postage, prepaid, U.S. Mail, or, where specified, electronically:

Served electronically:
Office of the U.S. Trustee;
Jason Wilson-Aguilar; case trustee

Dated this 12th Day of February, 2020.

/s/ Mark A. Ditton #45432
Mark A. Ditton, WSBA #45432
Attorney for Debtor(s)

Label Matrix for local noticing
0981-2
Case 17-14012-TWD
Western District of Washington
Seattle
Wed Feb 12 10:33:40 PST 2020

American General Financial/Springleaf Fi
Springleaf Financial/Attn: Bankruptcy De
Po Box 3251
Evansville, IN 47731-3251

Barclay
PO Box 8801
Wilmington, DE 19899-8801

Barclays Bank Deleware
100 S West St.
Wilmington, DE 19801-5015

Cardworks/CW Nexus
Attn: Bankruptcy
Po Box 9201
Old Bethpage, NY 11804-9001

Mark Ditton
Northwest Debt Relief Law Firm
1312 Main Street
Vancouver, WA 98660-2919

Fst Premier
601 S Minneapolis Ave
Sioux Falls, SD 57104

LVNV Funding, LLC its successors and assigns
assignee of Echelon Diversified Fund, LP
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

MERRICK BANK
Resurgent Capital Services
PO Box 10368
Greenville, SC 29603-0368

Montgomery Ward
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

Aarons Sales & Lease
Attn: Bankruptcy
309 E Paces Ferry Rd Ne
Atlanta, GA 30305-2367

Ashley Funding Services, LLC its successors
assigns as assignee of Laboratory
Corporation of America Holdings
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Barclays Bank Delaware
100 S West St
Wilmington, DE 19801-5015

Terri Denise Barnes
4837 South Holden St. #2
Seattle, WA 98118-4144

Comenitycapital/haband
Po Box 182125
Columbus, OH 43218-2125

Fingerhut
6250 Ridgewood Rd
St Cloud, MN 56303-0820

IRS
PO Box 7346
Philadelphia, PA 19101-7346

LVNV Funding, LLC its successors and assigns
assignee of FNEM, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Midland Credit Management
2365 Northside Dr. Ste. 300
San Diego, CA 92108-2709

North Coast Credit Uni
1100 Dupont St
Bellingham, WA 98225-3113

Accredited Home Lender
15253 Avenue Of Science
San Diego, CA 92128-3437

Avant Credit, Inc
640 N La Salle St
Suite 535
Chicago, IL 60654-3731

Barclays Bank Delaware
POB 8803
Wilmington, DE 19899-8803

Capital One
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Credit One Bank Na
Po Box 98873
Las Vegas, NV 89193-8873

First Svgs Bk-blaze
Po Box 5096
Sioux Falls, SD 57117-5096

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Lending Club Corp
71 Stevenson St
Suite 300
San Francisco, CA 94105-2985

Midland Funding LLC
PO Box 2011
Warren MI 48090-2011

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Premier Bankcard, Llc
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud Mn 56302-7999

Quantum3 Group LLC as agent for
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Seventh Avenue
Seventh Avenue, Inc
1112 7th Ave
Monroe, WI 53566-1364

Synchrony Bank/ JC Penneys
Attn: Bankruptcy
Po Box 956060
Orlando, FL 32896-0001

Synchrony Bank/Chevron
Attn: Bankruptcy
Po Box 956060
Orlando, FL 32896-0001

Synchrony Bank/Walmart
Attn: Bankruptcy
Po Box 956060
Orlando, FL 32896-0001

United States Trustee
700 Stewart St Ste 5103
Seattle, WA 98101-4438

Douglas Burrell Williams
4837 South Holden St. #2
Seattle, WA 98118-4144

Jason Wilson-Aguilar
600 University St #1300
Seattle, WA 98101-4102

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-9617

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

End of Label Matrix	
Mailable recipients	39
Bypassed recipients	0
Total	39